

JP:TJS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-133

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18 U.S.C. § 1546)

CHIDIEBERE ONWUCHEKWA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SUHAIB KARIM QURESHI, being duly sworn, deposes and states that he is a Special Agent with the Department of State ("DOS"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 5, 2011, within the Eastern District of New York, the defendant CHIDIEBERE ONWUCHEKWA, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for this belief are as follows:¹

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the DOS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP agents, interviewed the defendant and reviewed documents.

2. On February 5, 2011, at approximately 3:00 p.m., the defendant CHIDIEBERE ONWUCHEKWA, arrived at John F. Kennedy International Airport ("JFK") on Emirates Airlines, Flight No. 201 originating from Dubai, United Arab Emirates. Upon arrival, the defendant presented Nigerian passport #A02215437, issued on July 9, 2010 in the name of "CHIDIEBERE ONWUCHEKWA," place of birth Kaduna, Nigeria to a CBP officer. The passport contained a B1/B2 visa, Visa Foil No. C7300716 (Control No. 20103095620001), issued by the United States Department of State Bureau of Consular Affairs on November 8, 2010.


3. In response to questions, CHIDIEBERE ONWUCHEKWA stated, in sum and substance, that he was coming to the United States for an engineering conference in Houston, Texas. However, he had no ticket to travel to Texas. He also appeared visibly nervous during questioning. The defendant CHIDIEBERE ONWUCHEKWA, was then selected for a secondary inspection by CBP officers.

4. During the secondary inspection, the defendant CHIDIEBERE ONWUCHEKWA, presented his passport and B1/B2 visa and stated that he was a Nigerian citizen. He originally stated, in sum and substance, that he was the Chief Executive Officer of Chidenco Machines Enterprise. In response to questioning

regarding the purported conference and Chidenco Machines Enterprise, CHIDIEBERE ONWUCHEKWA stated, in sum and substance, that he was not the Chief Executive Officer of Chidenco Machines Enterprises and was coming to the United States seeking work. He further stated, in sum and substance, that he had made false statements on his United States visa application and had used fraudulent document vendors located in Nigeria to provide documents to support his false statements. He also stated, in sum and substance, that he made false statements to U.S. Department of State officials at the U.S. Embassy when he applied for the United States visa.

5. CBP officers then notified DOS. I responded with another Special Agent. After providing the defendant with his Miranda rights, the defendant reiterated, in sum and substance, that he had provided fraudulent information on his United States visa application and to U.S. Department of States officials at the U.S. Embassy when he applied for the United States visa.

WHEREFORE, your deponent respectfully requests that the defendant CHIDIEBERE ONWUCHEKWA, be dealt with according to law.



SUHAIB KARIM QURESHI
Special Agent
United States Department
of State

Sworn to before me this
7th day of February, 2011

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